

Ari B. Teman

Mon, 10 April 2023
19th of Nisan, 5783
Pesach V (Chol Hamoed)

The Honorable Paul Engelmayer
District Judge
Southern District of New York
40 Foley Square,
New York, NY

Re: Permission to travel to Israel for three weeks (Per Dkt. No. 300)

Your Honor,

I write to Your Honor on this, the 3rd Day of Chol Hamoed Passover, when use of electronic devices is permitted by even the strictest Orthodox Jewish authorities, to respectfully request permission to travel to Israel for three weeks to visit my mother pending her surgery.

Your Honor previously (Dkt. No. 325) indicated that such permission would be granted, and requested proof of the pending surgery. Because I do not know how to file documents under seal, I am simultaneously emailing Your Honor’s Chambers and Mr. Bhatia copies of the surgery orders, with the request that they not be docketed or if they must be docketed that they be sealed, in the interest of my mother’s privacy and dignity. The documents are in Hebrew, but they were marked up to indicate relevant sections.

Your Honor previously indicated that he would permit two weeks. I ask for three weeks because my mother has requested that I take a week to ensure I did not get a COVID strain during travel, which is common, before I meet with her and my father, who are both battling health issues.

I have not seen my parents in-person for more than seven (7) years, and so two weeks is already a very short amount of time, so I ask that Your Honor grant the permission for three weeks so I may spend two with my parents and other family members.

I remain a non-flight risk. I and many legal experts, including multiple professors from Your Honor’s alma mater, Harvard Law School, are sure we will win the Appeal, and Your Honor is aware that we have abundant material for a Rule 33 motion and a 2255 motion, regardless.

Furthermore, I have previously traveled to Australia (Dkt. No. 300) and returned. Like Australia, Israel extradites.

Pretrial services will be able to confirm my location via video chat, just as they were able with my trip to Australia.

Depending on Your Honor's timing to approve this request and available flights, as I cannot book the flight without permission and my passport (held currently by Officer Ozoria of Pretrial Service in SDFL), I will leave shortly after Passover, the week of April 17 and return to NYC shortly before May 10, 2023, to attend my hearing in NYC before the 2nd Circuit on May 11, 2023.

Wishing Your Honor and those who celebrate a Moadim L'Simcha, a Happy Passover,

Thank you,

A handwritten signature in grey ink, consisting of a series of connected loops and a long horizontal stroke extending to the right.

Ari Teman
Defendant,
Pro Se (not by choice)